

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

CARL G. SIMPSON, et al,
Plaintiffs,

COPY

VS. Civil Action No: C-1-000014
INTERMET CORPORATION, et al.
Defendants.

DEPOSITION OF PAUL KELLEY

The deposition of Paul Kelley was taken on
July 15, 2003 at the approximate hour of
9:00 a.m., at 215 South Fourth Street,
Ironton, Ohio.

Elite Court Reporting
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Amanda Burgess, Court Reporter

CASE NO. C-1-000014

1 -- when the activation button was hit, gates came down
2 and you couldn't get in there. I mean, what should have
3 been on there to begin with. It slowed the process
4 down, but it was actually -- it was extremely safe.

5 Q. So the gates -- the gates only came down while
6 the machine was in operating mode; is that correct?

7 A. Right.

8 Q. And that's the only time that they came down?

9 A. Right. Well, the gates had to go up because when
10 you were taking -- when the mold was -- when the table
11 was going in to pick the molds up, the gates had to be
12 up or the transfer table wouldn't go in.

13 Q. Would the gates be open when you'd remove the
14 sticker?

15 A. Well, they would have to be because it would be
16 locked.

17 Q. So you wouldn't use the gates while you were
18 removing the sticker; is that correct?

19 A. No. You couldn't. Couldn't get in it.

20 Q. Now, you mentioned platforms and the gates. Was
21 there anything else that was added or changed on the
22 Sutters?

23 A. Well, like I say, the platforms to stand on, and
24 there were like rails put around so you wasn't falling